



DSA PROCEDURE 05-03

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To: DSA Regional Offices Staff
From: Division of the State Architect
Department of General Services
State of California

SUBJECT: Rapid Interpretation Process (RIP)

1. Purpose and Goal: The Rapid Interpretation Process (RIP) has been established to provide technical support to the four DSA regional offices by processing official interpretations of the California Building Code or other applicable standards, laws, or regulations. The RIP process will also enable DSA to recommend policies, regulation changes or interpretations of regulations arising out of a specific interpretation.

The process is intended to resolve issues arising with its clients by accomplishing the following four goals:

- 1.1** Provide accurate, effective, and timely dispute resolution assistance by issuing project specific interpretations of regulations enforced by DSA. Interpretations are developed utilizing a discipline specific Code Interpretation Committee (CIC). The interpretations rendered by the committee represent the official position of the DSA.
- 1.2** Resolve issues by considering input from affected parties.
- 1.3** Provide answers to all affected parties. When the interpretation is likely to have broad application, the committee shall make its interpretations available to the public in order to gain consistency in design submittals
- 1.4** Achieve consistency between Regional Offices. The committee shall make its interpretations available to all DSA staff, in order to gain consistency in future decisions made by DSA regional offices

2. RIP Procedure: The RIP process is described below.

Note: If at any point the client agrees with a DSA determination or DSA agrees with the client's interpretation, the process is discontinued.

2.1 Structural Safety

- 2.1.1** When a decision is made by DSA plan review or field review staff and the client does not agree, the client may ask for review by the Regional Office's supervising structural engineer.
- 2.1.2** If the client does not agree with the decision of the supervising structural engineer, the client may ask for the decision to be reviewed by the DSA Regional Office manager, for structural safety issues only.

2.1.3 If the client does not agree with the decision of the DSA Regional Office manager, the client may ask the Regional Office manager for review by the DSA Headquarters Structural Safety Code Interpretation Committee (CIC). [See "Initiating a CIC Review" below]

2.1.4 The regional manager shall be responsible for clearly documenting DSA's position on the issue, with any associated reasoning in support of such position, in addition to citing any applicable building code sections, DSA policies, or other relevant information.

2.2 Fire/Life Safety and Access Compliance

2.2.1 When a decision is made by DSA plan review or field review staff and the client does not agree, the client may ask for review by the Regional Office's discipline lead person.

2.2.2 If the client does not agree with the decision of the discipline lead person, the client may ask the DSA Regional Office manager for the decision to be reviewed by the appropriate DSA Headquarters Fire/Life Safety or Access Compliance Code Interpretation Committee (CIC). [See "Initiating a CIC Review" below]

2.2.3 The discipline lead person/discipline supervisor shall be responsible for clearly documenting DSA's position on the issue, with any associated reasoning in support of such position, in addition to citing any applicable building code sections, DSA policies, or other relevant information. Such documentation shall be forwarded to the regional manager. For Fire/Life Safety, documenting DSA's position can include specific interpretations as provided by the State Fire Marshal or model code organizations. For Access Compliance, documenting DSA's position can include specific federal guidelines, federal interpretations, or other laws that apply to persons with disabilities.

2.3 Initiating a DSA Headquarters Code Interpretation Committee (CIC) review:

2.3.1 All requests for CIC review of a DSA Regional Office decision start the same way:
All decisions appealed to the CIC will be recorded in writing. The client shall be responsible for clearly documenting their position on the issue and include a description of the issue, reasons for making the appeal of the DSA decision, with any associated reasoning in support of such position, including any applicable building code sections, DSA policies, or other relevant information, and a specific contact person for any questions and final response.

2.3.2 Within 48 hours of receipt of all the documentation, the Regional Manager shall forward the documentation, or other materials relevant to the issue, to the DSA Headquarters CIC, and shall notify the client that the documents have been forwarded to HQ. The DSA Regional Office is responsible for providing documentation of the DSA position.

2.3.3 All requests for interpretations, if possible, shall be written in such a form that they can be answered either "yes" or "no". Questions not clearly phrased will be rewritten by the CIC for accuracy and conciseness. Questions addressing separate topics shall be clearly identified as such.

2.3.4 In all cases, the CIC will contact the client and the regional office to assure the question is clearly understood.

2.4 Review by the CIC

2.4.1 Processing of RIP requests is intended to provide that each request complies with these procedures, that the interpretation reflects the intent of the code, and that the interpretation is processed in a timely manner.

2.4.2 CIC interpretations are intended to clarify issues which are not addressed directly by the literal text of the California Building Code and are interpretive in nature. A request for a CIC interpretation will not be processed if it involves: (1) judgment or knowledge not readily available in the written request or which can only be acquired as a result of an on-site inspection, and (2) code text that clearly provides the requested information. The Committee will only consider project specific interpretations made through the RIP.

2.4.3 The DSA Headquarters has three discipline specific Code Interpretation Committees (CIC); one for each discipline with 4 persons on each Committee. These committees are:

- Structural Safety,
- Fire/Life Safety, and
- Access Compliance.

All correspondence relating to requests for committee interpretations shall be directed to the appropriate discipline CIC for the discipline that the interpretation request applies to. In cases where the interpretation request applies to more than one discipline group, each applicable CIC shall receive correspondence relating to such request, and decisions made by each CIC are independent of one another, except when interpretation of one discipline has impact on interpretation of other discipline.

2.4.4 Membership of each CIC shall be as follows:

Structural Safety CIC

HQ Principal Structural Engineer

- 2 HQ Structural Engineers
- Regional Manager or his designated Structural Engineer from a regional office not associated with the request.
- (Optionally) A Consultant Structural Engineer with an existing contract with DSA.

The HQ Principal Structural Engineer will act as the Structural Safety CIC lead.

Fire/Life Safety CIC

- HQ Principal FLSO
- HQ Principal Architect
- 2 lead FLSO's from regional offices not associated with the request.
- (Optionally) A Consultant with an existing FLSO contract with DSA.

The Principal FLSO will act as the Fire/Life Safety CIC lead.

Access Compliance CIC

- HQ Principal Architect (Access Compliance)
- 2 HQ Architects (Supervising or Senior)
- an Access Compliance Senior Architect from a regional office not associated with the request.
- (Optionally) A Consultant with an existing ACS contract with DSA.

The HQ Principal Architect will act as the Access Compliance CIC lead.

- 2.4.5** The discipline specific CIC lead processes each request, and designates a discipline group staff person to provide the answer and reasons for the answers to the interpretation question. The designated staff person then distributes the answer to all members of the discipline group for review. The CIC lead will communicate with the Regional Office and the client during its deliberation. If concurrence from the group approving the answer and reasons for the answers is not received from each discipline group member within 5 working days, the discipline group shall meet to discuss and reach a decision.
- 2.4.6** The discipline group lead shall notify the requesting regional office, and a committee interpretation shall be issued to all regional offices and posted on the DSA Intranet site, and a copy provided to the client.
- 2.4.7** The CIC lead shall ensure that the decision of the CIC will be rendered in ten (10) working days or less from the date that the request was received.
- 2.4.8** Any client or DSA staff member can request that an existing committee interpretation be reviewed based on revisions to applicable regulations, policies, standards, federal guidelines, interpretations, or other laws that may affect the validity or accuracy of such interpretation. The committee shall follow the process above in revising the interpretation, deleting it, or denying the request for review. Any revisions to, or deletions of previously rendered interpretations shall be recorded in writing, dated, and made available to the public and to DSA staff. A record of all interpretations prior to revision, or prior to deletion, shall be maintained in DSA records.

3. Contesting the RIP Decision:

- 3.1** In the event satisfaction has not been reached through DSA's Rapid Interpretation Process #05-03 (RIP), an application for review may be entered by entities submitting building projects for DSA review, hereafter known as the applicant to the Board.
- 3.2** In order to request a review from the Board, applicants shall exhaust all levels of review stated in the RIP.
- 3.3** To be considered, a review shall be filed within three months of a decision rendered by the Code Interpretation Committee as established through the RIP.
- 3.4** Material presented to the Board for review shall include only material submitted through the RIP by the applicant, materials and references used by DSA staff to arrive at a decision, and the decision rendered.

In addition, the following shall be provided by the applicant:

- 3.4.1** The reasons for the application for DSA Advisory Board review.
- 3.4.2** Documentation of the RIP decision in question.
- 3.5** An applicant may submit a written request for the Board to review the RIP decision in question to the attention of the Executive Director of the Board addressed to:

Division of the State Architect Advisory Board
1102 Q Street, Suite 5100
Sacramento, CA 95814